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and

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*Attorneys for Defendants,*  
*Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH	)	
Individually and as Parent and Legal Guardian	)	
of W.W., K.W., G.W., and L.W., minor children	)	
and MATTHEW WADSWORTH,	)	
	)	<b>Case No. 2:23-cv-00118-NDF</b>
Plaintiffs,	)	
	)	
v.	)	<b>DECLARATION OF</b>
	)	<b>EUGENE M. LAFLAMME</b>
WALMART INC. and	)	<b>SUPPORT OF MOTION FOR</b>
JETSON ELECTRIC BIKES, LLC,	)	<b>SUMMARY JUDGMENT</b>
	)	
Defendants.	)	

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I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. Attached as Exhibit 1 is a true and correct copy of Plaintiffs' Complaint, Doc 1, filed July 6, 2023.
4. Attached as Exhibit 2 are the pertinent portions of G. W.'s deposition taken on May 20, 2024.
5. Attached as Exhibit 3 are the pertinent portions of Plaintiffs' fire origin expert report prepared by Michael J. Schulz.
6. Attached as Exhibit 4 are the pertinent portions of L. W.'s deposition taken on May 20, 2024.
7. Attached as Exhibit 5 are the pertinent portions of Plaintiff Stephanie Wadsworth's deposition taken on February 27, 2024.
8. Attached as Exhibit 6 are the pertinent portions of Plaintiff Matthew Wadsworth's deposition taken on February 26, 2024.
9. Attached as Exhibit 7 is a true and correct copy of the expert report prepared by Rimkus Joseph Filas., IAAI-CFI, NFAI-CFEI dated September 13, 2024.
10. Attached as Exhibit 8 is a true and correct copy of the expert report prepared by AEI Corporation's Brian N. Strandjord, PE, CFI, CFEI dated September 13, 2024.
11. Attached as Exhibit 9 is a true and correct copy of Defendant Jetson Electric Bikes Answer & Affirmative Defenses, Doc 18, filed August 9, 2023.

12. Attached as Exhibit 10 are the pertinent portions of Plaintiffs' fire cause expert report prepared by Derek King.

13. Attached as Exhibit 11 are the pertinent portions of Plaintiffs' fire cause expert Derek King's deposition taken on August 19, 2024.

14. Attached as Exhibit 12 is a true and correct copy of the sign-in sheet from the October 30, 2023 Laboratory Examination at Palmer Engineering and Forensics.

15. Attached as Exhibit 13 is a true and correct copy of NFPA 921 (2021 ed.) sections 3.3.9, 4.2, 4.3 to 4.3.7, 4.3.9, 4.4.5, 18.4 and 19.4.

16. Attached as Exhibit 14 are the pertinent portions of Green River Sheriff Department's Detective Sergeant Jeff Sheaman's deposition taken on November 16, 2023.

17. Attached as Exhibit 15 are the pertinent portions of Green River Fire Department Assistant Fire Chief Bill Robinson's deposition taken on November 15, 2023.

18. Attached as Exhibit 16 are the pertinent portions of Plaintiffs' Initial Expert Witness Disclosures Doc 73-3 filed on July 15, 2024.

19. Attached as Exhibit 17 are the pertinent portions of Plaintiffs' Initial Expert Witness Disclosures Doc 73-3 filed on July 15, 2024.

20. Attached as Exhibit 18 are the pertinent portions of Plaintiffs' fire origin expert Michael Schultz's deposition taken on September 10, 2024.

21. Attached as Exhibit 19 are the pertinent portions of the Order Denying Plaintiffs' Motion to Amend Expert Disclosures, Doc 93, filed November 18, 2024.

22. Attached as Exhibit 20 are the pertinent portions of Jetson representative Sam Husain's deposition taken on May 17, 2024.

23. Attached as Exhibit 21 are the pertinent portions of Walmart representative Coryn Kremers' deposition taken on May 31, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 2, 2024



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Eugene M. LaFlamme